

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

DR. PAUL ROYSDON,

Plaintiff,

v.

UNITED STATES, *et al.*,

Defendants.

No. 5:22-cv-00869-JKP-HJB

EXHIBIT 4 – DEFENDANTS’ EXHIBIT LIST

Defendants file this designation of exhibits under the Court’s Amended Bench Trial Scheduling Order (ECF No. 99), the Federal Rules of Civil Procedure, and Local Rule 16(f)(4).

Ex. No.	Description	Will Offer	May Offer
D-1	OSI Form 40 (with attachments)	X	
D-2	Brown to McVeigh sending NSA Altered Email (Aug. 20, 2020)	X	
D-3	Bremer Appointment Letter (Aug. 25, 2020)	X	
D-4	Bremer Report (Sep. 22, 2020)	X	
D-5	August 24, 2020 Email Chain re paperwork	X	
D-6	Inquiry Official Briefing Meeting Invite (Aug. 27, 2020)	X	
D-7	McVeigh to Beall, Ranft, Bremer re Jaspers (Sept. 1, 2020)	X	
D-8	Ekholm to R. Brown re Request for Investigating Officer (Aug. 25, 2020)	X	
D-9	Email Chain with Beall, Brown, McV, et al. re RE Fib DD254 (Aug. 20, 2020)		X
D-10	Group Texts with Roysdon re PMR (Feb. 2020)	X	
D-11	HNCO Security Team Email Chain re Roysdon write-up (Aug. 27, 2020)		X
D-12	Morin to Bremer re Inquiry Official Letter (Aug. 27, 2020)		X
D-13	Beall to Burghard Email re Roysdon Debrief (Aug. 28, 2020)	X	

D-14	Email Chain with McVeigh and AFRL re Tech SME (Aug. 18, 2020)		X
D-15	Jaspers to Brown re Leidos - Research (Jan. 26, 2020)		X
D-16	Ratermann to Roysdon (Feb. 2, 2023)		X
D-17	Ratermann to Roysdon (Mar. 27, 2023)		X
D-18	Jaspers to Gan, et al. (Apr. 3, 2023)		X
D-19	Jaspers to Brown re Cyber AI Cheatsheet (Apr. 5, 2023)		X
D-20	Jaspers to Brown, et al. (Apr. 10, 2023)		X
D-21	Roysdon to Ratermann Email (Apr. 12, 2023)		X
D-22	Capt. Gan to Jaspers Re Leidos Capability (Apr. 12, 2023)		X
D-23	GITI Task Order (June-Sept 2019)		X
D-24	GITI Task Order (October-December 2019)		X
D-25	GITI Modification (June 2020)		X
D-26	StarNav Invoices		X
D-27	OIG Hotline Report Completion		X
D-28	GITI Monthly Report Summaries		X
D-29	Email Chain re NEED TO TALK SECURITY		X

Defendants reserve the right to offer additional exhibits for impeachment, or as necessary for rebuttal or to refresh a witness's recollection. Defendants further reserve the right to introduce any exhibits used or identified by Plaintiff.